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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL PERSONAL
IDENTIFYING INFORMATION
CONTAINED IN DEFENDANTS' REPLY
SUPPORTING MOTION FOR ENTRY OF
AN ORDER TO SHOW CAUSE AND
LIMITED DEPOSITIONS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

DEFENDANTS' STATEMENT IN SUPPORT OF SEALING CONFIDENTIAL MATERIALS

Under Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC ("Uber" or "Defendants") hereby move this Court for an order to seal the personal identifying information ("PII") contained in their Reply Supporting Motion for Entry of an Order to Show Cause and Limited Depositions (the "Reply") and some of its exhibits. The Reply and exhibits contain PII from materials produced by both Uber and Plaintiffs. The Reply and exhibits are attached as Exhibit A, filed concurrently to this Administrative Motion.

A party seeking to seal a judicial record bears the burden of establishing that "compelling reasons" support that request. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178–79 (9th Cir. 2006). Specifically, that party must "articulate[] compelling reasons supported by specific factual findings . . . that outweigh the general history of access and the public policies favoring disclosure [of court records], such as the 'public interest in understanding the judicial process.'" *Id.* (quoting *Foltz v. State Farm Mut. Auto. Ins.*, 331 F.3d 1122, 1135 (9th Cir. 2003)). "In turn, the [C]ourt must 'conscientiously balance[] the competing interests' of the public and the party who seeks to keep certain judicial records secret." *Id.* at 1179 (quoting *Foltz*, 331 F.3d at 1135).

Assessment of the public and private interests implicated here warrant sealing this information. Local Rule 79-5(c)(1)(i). Uber in particular seeks to seal the names of a Plaintiff and non-party contained throughout the Reply and exhibits, as well as home and other addresses,¹ contact information such as phone numbers and email addresses, and financial information such as credit card numbers. Courts have found that such information "is sealable under the compelling reasons standard." *See, e.g., Kumandan v. Google LLC*, No. 19-cv-04286-BLF, 2022 WL 17971633, at *1 (N.D. Cal. Nov. 17, 2022). That is because such information is "not relevant to any of the issues in this litigation, nor would the public have any real interest in its disclosure." *O'Connor v. Uber Techs., Inc.*, No. C-13-3826 EMC, 2015 WL 355496, at *3 (N.D. Cal. Jan. 27, 2015). On the other hand, the public disclosure of the PII contained within the Reply could cause significant and avoidable harm or embarrassment to the affected individuals. Moreover,

¹ Uber proposes redacting all addresses, because Uber is not able to assess which addresses are potentially personally identifying.

no less restrictive alternative to sealing the PII in the Reply is sufficient. Local Rule 79-5(c)(1)(iii). Uber's request is narrowly tailored to seal only the PII while ensuring that the public retains access to the rest of the Reply and related documents. This Court may therefore "appropriately balance[]" the privacy interests of the affected individuals with the public's right to access by allowing redaction of all such PII in the Reply. *O'Connor*, 2015 WL 355496, at *2.

CONCLUSION

For the foregoing reasons, Uber respectfully requests this Court grant this Administrative Motion to seal the personal identifying information, specifically the names, addresses, financial information, and contact information contained in the Reply and related documents.

DATED: November 3, 2025

Respectfully submitted,

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